

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

25cr223 JRT/DJF

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2252(b)(1)

v.

18 U.S.C. § 2422(b)

18 U.S.C. § 2427

MICHAEL BRUCE GILLIS,

18 U.S.C. § 2253

18 U.S.C. § 2428

Defendant.

21 U.S.C. § 853(p)

THE UNITED STATES GRAND JURY CHARGES THAT:

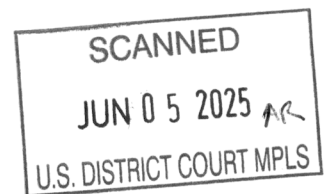
**COUNT 1**

**(Attempted Production and Production of Child Pornography)**

On or about March 2, 2025, in the State and District of Minnesota, the  
defendant,

**MICHAEL BRUCE GILLIS,**

attempted to and did employ, use, persuade, and entice Minor Victim A to  
engage in sexually explicit conduct for the purpose of producing a visual  
depiction of such conduct, which visual depiction was produced and  
transmitted using materials that had been mailed, shipped, and transported  
in interstate and foreign commerce, and which visual depiction was actually  
transported and transmitted using a means and facility of interstate and  
foreign commerce, and in and affecting interstate and foreign commerce,  
namely, two sexually explicit image files, IMG\_0170.HEIC and



IMG\_0205.HEIC, all in violation of Title 18, United States Code, Section 2251(a) and 2251(e).

**COUNT 2**  
**(Enticement of a Minor)**

On or about March 2, 2025, in the State and District of Minnesota, the defendant,

**MICHAEL BRUCE GILLIS,**

did use a facility and means of interstate and foreign commerce to knowingly persuade, induce, and entice Minor Victim A, an individual who had not attained the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense, namely, the production and attempted production of child pornography in violation of Title 18, United States Code, Sections 2251(a) and Criminal Sexual Conduct in the Third Degree in violation of Minnesota State Statute Section 609.344, subd.1a, all in violation of Title 18, United States Code, Sections 2422(b) and 2427.

**COUNT 3**  
**(Attempted Enticement of a Minor)**

On or about August 7, 2024, in the State and District of Minnesota, the defendant,

**MICHAEL BRUCE GILLIS,**

did use a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, and entice an individual who had not attained

the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense, namely, Solicitation of Person Believed to Be a Child Through Electronic Communication to Engage in Sexual Conduct in violation of Minnesota State Statute Section 609.352, subd.2a, all in violation of Title 18, United States Code, Sections 2422(b).

### **FORFEITURE ALLEGATIONS**

Upon conviction of Count 1, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property.

The property subject to forfeiture upon conviction of Count 1 includes but is not limited to: 128GB Sandisk Model 3.2 Gen1 USB drive bearing serial number 04010aad48dded448193.

Upon conviction of Counts 2 or 3, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428, any property real or personal, used or intended to be used to commit or to facilitate the commission of the offense, and any property, real or personal, that constitutes or is derived from proceeds traceable to the violation.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

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ACTING UNITED STATES ATTORNEY

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FOREPERSON